Drug Interactions: What Do We Know about Non-CYP Drug Metabolizing Enzymes and Transporters?

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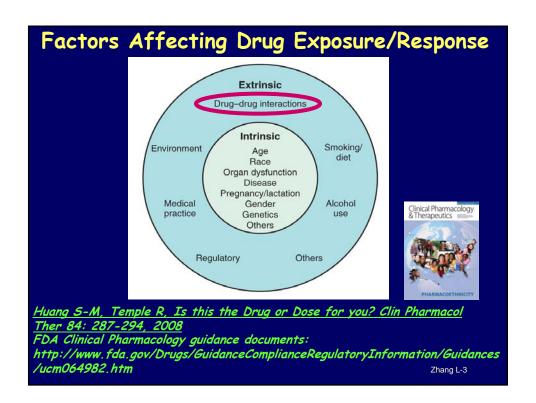
16th ISSX North American Regional Meeting Baltimore, MD

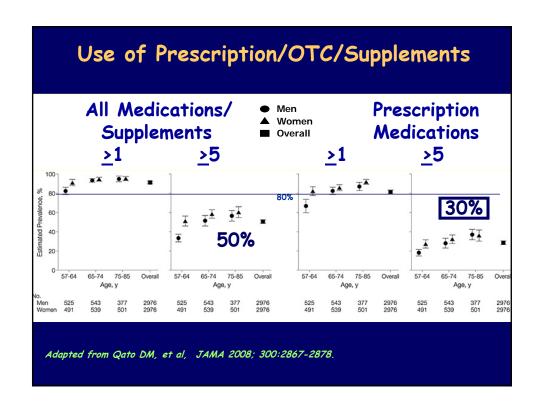
October 21, 2009

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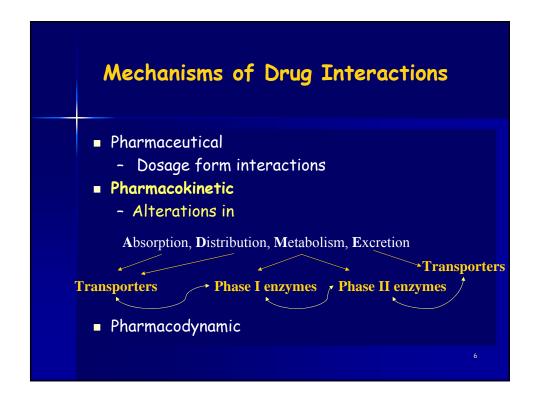
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Drugs Withdrawn from the US Market due to Safety Reasons							
	·	nui ke	i due 10 3a	Tely Reasons			
Withdrawn	Approv	Drug name	Use	Risk			
1998	1997	Mibefradil	High blood pressure/Chronic stable angina	Torsades de Pointes; Drug-drug interaction			
1998	1997	Bromfenac	NSAID	Acute liver failure			
1998			Antihistamine	Torsades de Pointes; Drug-drug interaction			
1999	_	Astemizole	Antihistamine	Torsades de Pointes; Drug-drug interaction			
1999	1997	Grepafloxacin	Antibiotics	Torsades de Pointes			
2000(2002)*		Alosetron*	Irritable bowel syndrome in women	Ischemic colitis; complications of constipation			
2000	1993	Cisapride	Heartburn	Torsades de Pointes; Drug-drug interactior			
2000			Diabetes	Acute liver tailure			
2001			Cholesterol lowering	Rhabdomyolysis; Drug-drug interactions			
2001	1999	Rapacuronium		Bronchospasm			
2003		Levomethadyl		Fatal arrhythmia			
2004	1999	Rofexocib	Pain relief	Heart attack; stroke			
2005	2001	Valdecoxib	Pain relief	Skin reactions (SJS)			
2005(2006)*		Natalizumab*		Brain infection			
2005	2004	99m Tc**	Diagnostic aid	Cardiopulmonary arrest			
2005	1975	Pemoline	ADHD	Liver failure			



Guidance for Industry

Drug Interaction Studies — Study Design, Data Analysis, and Implications for Dosing and Labeling

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the Federal Register of the notice amounting the availability of the draft guidance. Submit comments to the Division of Dockett Management (EFA-305), Food and Drug Administration, 5500 Federa Lane, m. 1061, Rockville, MD 20532. All comments the Administration for which the docket number listed in the notice of availability that publishes in the Federal Register.

For questions regarding this draft document contact (CDER) Shiew-Mei Huang, 301-796-1541, or (CBER) Toni Stifano, 301-827-6190.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

September 2006 Clinical Pharmacology

Draft published for public comment September 11, 2006

http://www.fda.gov/downloads/Drugs/ GuidanceComplianceRegulatoryInformati on/Guidances/ucm072101.pdf

FDA Drug Development & Drug Interaction website

http://www.fda.gov/Drugs/DevelopmentA pprovalProcess/DevelopmentResources/Dr ugInteractionsLabeling/ucm080499.htm

Zhang L-7

Zhang L-8

- -Metabolism, transport, drug-interaction info key to benefit/risk assessment
- Need exposure-response info to determine clinical significance

October 2006, advisory committee meeting:
http://www.fda.gov/ohrms/dockets/ac/cder06.html#PharmScience
http://www.fda.gov/ohrms/dockets/ac/06/slides/2006-4248s1-index.htm
<Huang, Temple, Throckmorton, Lesko, Clin. Pharmacol. Ther. Feb 2007>
<Huang, Strong, Zhang, Reynolds, Nallani, Temple, et al, J Clin Pharmacol, June, 2008>
<Zhang, Zhang, Strong, Reynolds, Huang, Xenobiotica, July 2008>

Zhang



CYP Enzymes

Major CYPs (1A2, <mark>2B6, 2C8</mark>, 2C9, 2C19, 2D6, 3A)

- -specific substrates
- -specific inhibitors
- -inducers

In vitro and *in vivo*

Non-CYP-mediated DDI

Transporters

P-gp

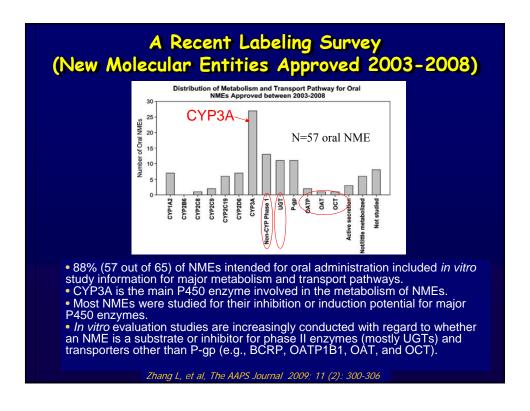
- specific substrates
- general inhibitors
- inducers

in vitro and in vivo

Others transporters: OATP, BCRP, OATs, OCTs, etc.

-general substrates, inhibitors, inducers (in vitro/in vivo) On-going

Biologics DDI



Non-CYP Enzymes

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Non-CYP Phase I Enzymes

- Monoamine oxidase (MAO)
 - Dopamine
- Xanthine oxidase (XO)
 - Theophylline, allopurinol
- · Alcohol/aldehyde dehydrogenase
 - Ethanol, methotrexate
- Flavin monooxygenase (FMO)

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Drug Interaction involving MAO inhibitors (MAOIs)

- The MAOIs are infamous for their numerous drug interactions (food, over-the-counter and prescription medicines)
- Food:
- MAO inhibitors (particularly MAOIs that inhibit the isozyme MAO-A) are known to interfere with the inactivation of tyramine found in various foods (e.g., cheese), leading to hypertensive crisis
 Dietary restriction
 Drugs: MAO substrates and substances that increase servicing particular and/or denomine activity
 - serotonin, norepinephrine, and/or dopamine activity
 - MAOIs should not be combined with other psychoactive substances (antidepressants, painkillers, stimulants, etc.)

 Class labeling of contraindication or
 - warnings/precautions SX October 21, 2009

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Phase II Enzymes

Reaction	Enzyme	Functional Group	
Glucuronidation	UDP-Glucuronyltransferase	-OH, -COOH, -NH2, -SH	
Glycosidation	UDP-Glycosyltransferase	-OH, -COOH, -SH	
Sulfation	Sulfotransferase	- NH2,, -SO2NH2, -OH	
Methylation	Methyltransferase	-OH, -NH2	
Acetylation	Acetyltransferase	-NH2, -SO2NH2, -OH	
Amino acid conjugation		-COOH	
Glutathione conjugation	Glutathione-S-transferase	Epoxide, organic halide	
Fatty acid conjugation		-OH	
Condensation		Various	

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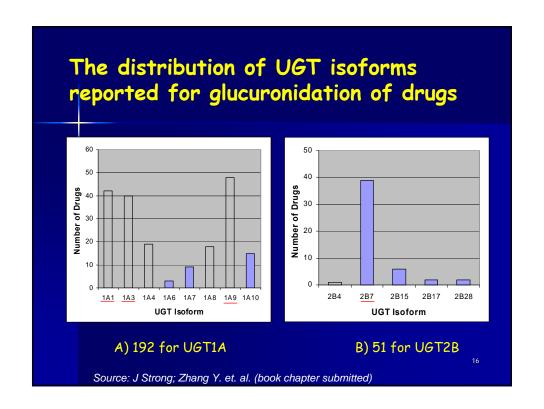
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UGTs

- Important metabolizing enzymes
 - Responsible for ~35% of all drugs metabolized by phase II enzymes
 - Also metabolize endogenous substances, e.g., bilirubin
- Multiple isoforms
 - > 20 cloned
- Expressed in liver as well as extrahepatic tissues such as kidney, intestine, colon, lung, etc.
 - Liver: UGT1A1, 1A3, 1A4, 1A6, 1A9, 2B7, 2B15, etc.
 - Extrahepatic: UGT1A7, UGT1A8, UGT1A10, etc.

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UGTs and Drug Interactions

- Like CYP enzymes, they are inhibitable and inducible and polymorphisms in UGTs lead to PK differences
- Unlike CYP enzymes, there is no consensus with respect to the in vitro tools, i.e., enzyme systems, selective substrates, inhibitors, or inducers for studying the UGT enzymes.

Lack of in vitro-in vivo correlation

- UGTs in general have broad and overlapping substrate selectivity
 Some isoforms show low affinity and high capacity
 Most inhibition < 3 fold</p>
 Clinical significance will depend on therapeutic window of the substrate drug
- · Polymorphisms in UGTs can affect extent of drug interaction
- In lieu of lack of specific UGT inhibitors, PK studies stratified by various UGT genotypes may illustrate the importance of that particular UGT pathway in PK or PD.

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Selected Drugs that are UGT Substrates

UGT	Substrates
1A1	(SN38), ezetimibe, mycophenolic acid, raloxifene, raltegravir
1 <i>A</i> 3	Deferasirox, ketoprofen, ezetimibe
1 <i>A</i> 4	Lamotrigine, posaconazole
1 <i>A</i> 6	(SN38)
149	Diflunisal, fenofibrate, (SN-38), mycophenolic acid, R-oxazepam, retigabine, rotigotine
2B7	Gemfibrozil, lamotrigine, mycophenolic acid, morphine, R-oxazepam, zidovudine
2B15	Lorazepam, tolcapone, rotigotine

- < Data from "Drugs @ FDA": http://www.accessdata.fda.gov/scripts/cder/drugsatfda/>
- < Kiang TKL, et al, Pharmacology & Therapeutics 2005: 106: 97-132>
- < University of Washington Drug Interaction database>

Selected Drugs that are UGT Inhibitors and Inducers

Inhibitors

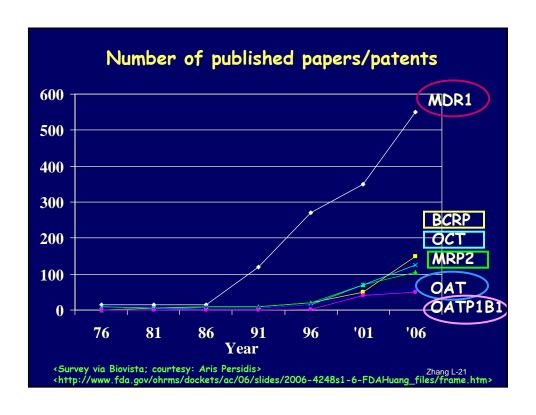
- -Decrease in CL up to 71%
- Atazanavir
- · Probenecid*
- Valproate

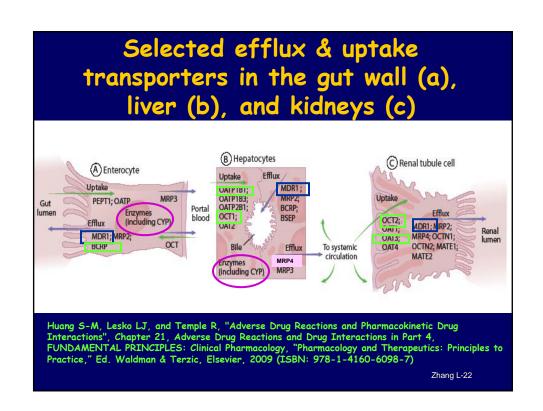
Inducers

- -Increase in CL up to 270%
- Rifampin
- Rifabutin
- Carbamazepine
- Phenytoin
- Oxcarbazepine
- Oral Contraceptives
- Ritonavir
- Nevirapine
- Methsuximide
- Phenobarbital

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Transporters





Complexities for Evaluation of Transporter-Mediated Drug Interactions

- Transporters are present in varying abundance in ALL tissues in the body
- Tissue-specific drug concentrations are determined by metabolism, uptake, and efflux transporters.
- Drug concentrations measured in plasma may not reflect levels in tissues.
- Redundant specificities among transporters within a particular tissue
 - Multiple transporters with overlapping substrate specificities will determine tissue specific drug concentrations.

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- 1. Overview of Transporters
 Overview, MDR1, BCRP, OAT/OCT, OATP
- 2. Methods for Studying Transporters

 Cell/membrane models, intact organ/in vivo models;

 modeling/imaging tools, enzyme/transporter interplay
- 3. Drug Development Issues

 Overview/example cases; decision trees;
- 4. Outstanding issues/conclusions

Zhang L-25

IND/NDA Discussions* Recommendations Transporter Post-marketing commitment as P-gp No data on P-ap substrate or inhibitor (oncology) OATP1B1 Recommended study with substrate lopinavir/ritonavir (HIV) OATP1BD Sponsor studied rosuvastatin inhibitor CYP3A OATP1B1 Sponsor studied simvastatin inhibitor

* $\underline{\text{Not an extensive list}};$ case examples from recent Investigational New Drug/New Drug Application discussions- courtesy of Abraham S, Booth B, Zhang L, Zhang YD

<SM Huang, DIA/FDA Critical Path Transporter Workshop>

Transporter Information in the Drug Labeling

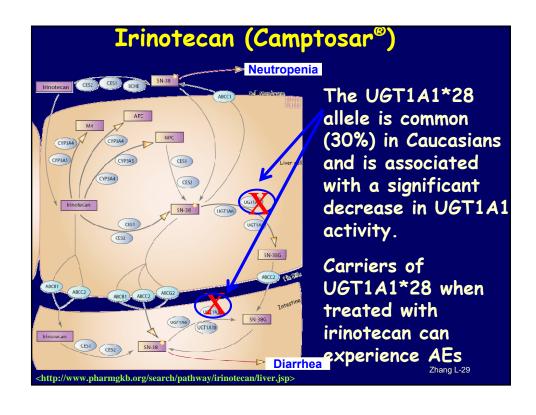
Transporter Drug Names*		
Р-др	Aliskiren, ambrisentan, [aprepitant], clarithromycin, colchicine, [dexvenafaxine], dronedarone, [eltrombopag], everolimus, fexofenadine, [fosaprepitant], [ixabepilone], lapatinib, maraviroc, nilotinib, paliperidone, posaconazole, [prasugrel], [[propafenone]], propranolol, ranolazine, saxagliptin, silodosin, sirolimus, sitagliptin, tipranavir**, tolvaptan, topotecan, [vorinostat]	
OATP1B1	Atorvastatin, <i>cyclospoprine</i> , <i>eltrombopag</i> ***, <i>lapatinib</i> , valsartan	
OATP	Ambrisentan	
OAT	Sitagliptin (OAT3)	
ОСТ	Metformin, pramipexole, [saxagliptin], [sitagliptin], vareniclin (OCT2)	
BCRP	Lapatinib, topotecan	
MRP	Mycophenolate (MRP2), [ixabepilone] (MRP1), valsartan (MRP2)	

*Not an extensive list: data based on a preliminary survey of electronic PDR and Drugs@FDA on September 18, 2009. They are substrates, inhibitors, (both substrates and inhibitors), [not a substrate or an inhibitor] or [[not studies as a substrate or an inhibitor]]; **:Tipranavir is also a P-gp inducer *** an inhibitor; its labeling contains a list of OATP1B1 substrates

Zhang L-27

<Huang, SM, Zhang L, Giacomini KM, Clin Pharmacol Ther (in press)>

New Drug Application (NDA) and Labeling Examples



CAMPTOSAR (irinotecan) [Dosage & Administration] When administered in combination with other agents, or as a single-agent, a reduction in the starting dose by at least one level of CAMPTOSAR should be considered for patients known to be homozygous for the UGT1A1*28 allele (See CLINICAL PHARMACOLOGY and WARNINGS).



THE FOOD AND DRUG ADMINISTRATION / AN AGENCY OF THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE

FOR IMMEDIATE RELEASE P05-53 August 22, 2005 Media Inquiries: Julie Zawisza 301-827-6242 Consumer Inquiries: 888-INFO-FDA

FDA CLEARS GENETIC TEST THAT ADVANCES PERSONALIZED MEDICINE Test Helps Determine Safety of Drug Therapy

Today, FDA cleared for marketing a new blood tool that will rieip doctors make personalized drug treatment decisions for some patients. The Invader UGT1A1 Molecular Assay Detects variations in a gene that affects how certain drugs are broken down and observed by the body. Doctors can use this information to help determine the right drug dosage for individual patients, and minimize harmful drug reactions.

"This test represents the power of DNA-based testing to provide individualized medical care," said Daniel Schultz, MD, Director of FDA's Center for Devices and Radiological Health. "These technologies can significantly improve patient management and reduce the risk of ineffective or even harmful drug therapy by telling doctors how to individualize drug dosing."

< http://www.fda.gov/cder/foi/label/2005/020571s024,027,028lbl.pdf >

nang L-30

'Irinogenetics: How Many Stars Are There in the Sky?"

J. Clin. Oncology 27:2604-14, 2009

Comprehensive Pharmacogenetic Analysis of Irinotecan Neutropenia and Pharmacokinetics

Federico Innocenti, Deanna L. Kroetz, Erin Schuetz, M. Eileen Dolan, Jacqueline Ramírez, Mary Relling, Peixian Chen, Soma Das, Gary L. Rosner, and Mark J. Ratain

 Variations in ABCB1, ABCC1, ABCC2, SLCO1B1, HNF1A, and UGT1A1 correlated with irinotecan and SN-38 exposure, explaining 30%-40% of the variations among individuals.

Zhang L-31

Beyond UGT1A1*28

-Irinotecan PK and Neutropenia-

Multiple factors: UGT1A1*93, ABCB1, ABCC1, ABCC2, SLCO1B1, Sex, etc...

→Would a composite pharmacogenetic test be more predictive than UGT1A1 alone?

→ Important transporter-based interactions?

Innocenti et al, J. Clin. Oncology 27:2604-14, 2009

Raltegravir Labeling -UGT1A1 Inhibition/Induction-

7.2 Effect of Other Agents on the Pharmacokinetics of Raltegravir

- "Raltegravir is not a substrate of cytochrome P450 (CYP) enzymes. Based on in vivo and in vitro studies, raltegravir is eliminated mainly by metabolism via a UGT1A1-mediated glucuronidation pathway."
- "Rifampin, a strong inducer of UGT1A1, reduces plasma concentrations of ISENTRESS. Therefore, the dose of ISENTRESS should be increased during coadministration with rifampin [see Dosage and Administration (2)]. The impact of other inducers of drug metabolizing enzymes, such as phenytoin and phenobarbital, on UGT1A1 is unknown."
- "Coadministration of ISENTRESS with drugs that inhibit UGT1A1 may increase plasma levels of raltegravir."

Zhang L-33

Raltegravir Labeling -UGT1A1 Polymorphism-

12.3 Pharmacokinetics

UGT1A1 Polymorphism

"There is no evidence that common UGT1A1 polymorphisms alter raltegravir pharmacokinetics to a clinically meaningful extent. In a comparison of 30 subjects with *28/*28 genotype (associated with reduced activity of UGT1A1) to 27 subjects with wild-type genotype, the geometric mean ratio (90% CI) of AUC was 1.41 (0.96, 2.09)."

July 2009 raltegravir (ISENTRESS) label http://www.accessdata.fda.gov/drugsatfda_docs/label/2009/022145s004lbl.pdf Zhang L-34

Atazanavir Labeling -UGT1A1 inhibition-

WARNINGS-Drug Interactions

Atazanavir is an inhibitor of CYP3A, CYP2C8, and UGT1A1. Coadministration of REYATAZ and drugs primarily metabolized by CYP3A [eg, calcium channel blockers, HMG-CoA reductase inhibitors, immunosuppressants, and phosphodiesterase (PDE5) inhibitors], CYP2C8, or UGT1A1 (eg, irinotecan) may result in increased plasma concentrations of the other drug that could increase or prolong its therapeutic and adverse effects.

February 2008 atazanavir (REYATAZ) label http://www.fda.gov/cder/foi/label/2008/021567s018lbl.pdf

Zhang L-35

Pitavastatin -OATP-

- 7th Statin approved in the U.S. in Aug 2009
 6th on the market
- Metabolized by glucuronidation via UGTs (major), CYP2C9, 2C8 (minor), etc.
- · A substrate for OATP1B1 (major), OATP1B3, and BCRP
- Like other statins, show dose/exposure-related myopathy side effects.
- Inhibition of OATP would be a concern.

<Hirano et al , Drug Metab Dispos. 34(7):1229-36m 2006,>
<Deng et al, Pharmacogenet Genomics. 18(5):424-33, 2008> ISSX
October 21, 2009

Cyclosporine and Pitavastatin

 Table 2. Effect of Co-Administered Drugs on Pitavastatin Systemic Exposure

 Co-administered drug
 Dose regimen
 Change in AUC*
 Change in Change in Change in AUC*

 Cyclosporine
 Pitavastatin 2 mg QD for 6 days + cyclosporine 2 mg/kg on Day 6
 ↑ 4.6 fold†
 ↑ 6.6 fold †

 Based on exposure-safety response analysis, cyclosporine is contraindicated with pitavastatin.

http://www.accessdata.fda.gov/drugsatfda_docs/label/2009/022363s000lbl.pdf

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Effect of Other Drugs on PK of Pitavastatin

Table 2. Effect of Co-Administered Drugs on Pitavastatin Systemic Exposure							
Co-administered drug	Dose regimen	Change in AUC*	Change in C _{max*}				
Cyclosporine	Pitavastatin 2 mg QD for 6 days + cyclosporine 2 mg/kg on Day 6	↑ 4.6 fold†	↑ 6.6 fold †				
Erythromycin	Pitavastatin 4 mg single dose on Day 4 + erythromycin 500 mg 4 times daily for 6 days	↑ 2.8 fold †	↑ 3.6 fold †				
Rifampin	Pitavastatin 4 mg QD + rifampin 600 mg QD for 5 days	↑ 29%	↑ 2.0 fold				
Atazanavir	Pitavastatin 4 mg QD + atazanavir 300 mg daily for 5 days	↑ 31%	↑ 60%				
Gemfibrozil	Pitavastatin 4 mg QD + gemfibrozil 600 mg BID for 7 days	↑ 45%	↑ 31%				
		1					

http://www.accessdata.fda.gov/drugsatfda_docs/label/2009/022363s000lbl.pdf

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OATP1B1 inhibitors

- √ Cyclosporine
- √ Gemfibrozil and gemfibrozil-O-glucoronide
- √ Rifampin
- √ · Clarithromycin, erythromyzcin, roxithromycin, telithromycin
- → Indinavir, ritonavir, saquinavir

<M Niemi, DIA/FDA critical path transporter workshop 2008>
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Post-Marketing Requirement for Pitavastatin

- A drug-drug interaction clinical trial to examine the effect of the combination of lopinavir/ritonavir on pitavastatin C_{max} and AUC.
- Projected report submission date:
 December 31, 2010

http://www.accessdata.fda.gov/drugsatfda_docs/appletter/2009/022363s000ltr.pdf

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Pitavastatin Labeling

7.2 Lopinavir/Ritonavir

Based on data with another HMG-CoA reductase inhibitor that has a similar pharmacokinetic profile to that of pitavastatin, coadministration of the protease inhibitor combination, lopinavir/ritonavir, with LIVALO may significantly increase pitavastatin exposure. Therefore, LIVALO should not be used with this combination of protease inhibitors. [see Limitations of Use (1.2)].

http://www.accessdata.fda.gov/drugsatfda_docs/label/2009/022363s000lbl.pdf>

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Summary (1)

- CYP-based interactions well defined in general; labeling recommendations based on clinical significance: exposure-response relationship & benefit/risk ratio
- Unlike CYP enzymes, there is no consensus with respect to the tools and criteria for studying the non-CYP enzymes for drug interaction evaluation and prediction.
 - -On a case-by-case basis
 - -Prior knowledge of the drug class, therapeutic range
 - -Therapeutic area and concomitant medications

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Summary (2)

- Phase II metabolism information has been increasingly included in the drug label (some with genotype-guided dosing).
- If an NME is predominantly eliminated via glucuronidation, the sponsor needs to consider identifying specific UGT enzymes with recombinant human UGTs, many available from commercial sources.

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Summary (3)

- Transporter-based interactions have been increasingly evaluated; results have been included in the drug label
 - P-gp based interactions are among the most evaluated
 - Other transporters (e.g., OATP, OCT, OAT, BCRP) are also evaluated based on therapeutic area drug class.
- * Study design issues need to be addressed (e.g., probe substrates, inhibitors)
- Post-marketing studies may be required if lack of non-CYP enzyme or transporter information would impact clinical safety/efficacy.

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Summary (4)

- Drug Interaction Guidance is being revised
- Efforts in development/evaluation of models predicting the extent of drug interactions ongoing at the FDA
- * in vitro to in vivo
- * single pair to multiple interactions
- multiple CYP inhibitors
- multiple modulators
 (CYP/transporter inhibition/induction)
- effect of non-CYP metabolizing enzymes
- effect of genetics

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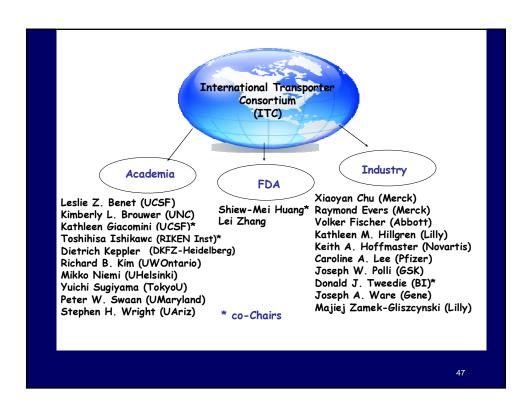
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Many who have provided comments on the guidance



Thank you! leik.zhang@fda.hhs.gov



Abbreviation List

- · P-gp: P-glycoprotein
- · MDR: Multidrug Resistance
- BCRP: Breast Cancer Resistant Protein
- · OAT: Organic Anion Transporter
- · OCT: Organic Cation Transporter
- OATP: Organic Anion Transporting Polypeptide

Land O'Lakes September 16, 2009

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 http://www.fda.gov/Drugs/DevelopmentApprovalProcess/DevelopmentResources/DrugInteractionsLabeling/ucm080499.htm, established May 2006
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